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May 24, 1991

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Implementation of Generic Letter 91-01
Request for Additional Information on PCOL-91/05

GNRO-91/00091

Gentlemen:

By letter dated April 8, 1991 (GNR1-91/00074), the Staff requested additional information in order to complete its review of our proposed change to the Grand Gulf Nuclear Station (GGNS) Operating License dated March 15, 1991 (GNRO-91/00047).

The proposed change requested that GGNS Technical Specifications (TS) be revised in accordance with Generic Letter 91-01. These revisions would relocate the surveillance specimen withdrawal schedule in TS Table 4.4.6.1.3-1 to the GGNS Updated Final Safety Analysis Report.

In response to the Staff request, the attachment to this letter provides our response to the questions transmitted April 8, 1991. The Staff requested a response within 30 days of receipt of their request; however, GGNS requested and received an extension to respond by May 24, 1991 from the NRC GGNS Project Manager on May 14, 1991.

If you require additional information, please advise.

Yours truly,

W T Cottle

WTC/PRS/ams
attachment: Response to Staff RAI on PCOL-91/05
cc: (See Next Page)

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RESPONSE TO STAFF RAI
ON PCOL-91/05

NRC REQUEST No. 1:

Generic Letter (GL) 91-01, "Guidance for the Removal of the Withdrawal Schedule for Reactor Vessel Material Specimens from Technical Specifications," allows removal of the surveillance specimen withdrawal schedule from the Technical Specifications (TS) and relocation of the schedule to the Updated Final Safety Analysis Report (UFSAR). However, changes to the schedule cannot be made pursuant to 10CFR50.59 because Section II.B.3 of Appendix H to 10CFR Part 50 requires NRC approval of any changes to the schedule prior to implementation. In your submittal and in the proposed revision to the Technical Specifications, you did not indicate how NRC approval of future changes to the withdrawal schedule would be requested and documented. Provide a statement in the proposed TS Bases section to indicate that written NRC approval will be obtained for any change to the withdrawal schedule, prior to incorporation into the UFSAR.

GGNS RESPONSE No. 1:

As discussed with the NRC Staff on May 14, 1991, providing a Bases discussion of how NRC approval of future changes to the specimen withdrawal schedule would be requested and documented is redundant to existing regulations and runs counter to the intent of GL 91-01 to remove redundancy. Grand Gulf Nuclear Station (GGNS) will maintain the NRC-approved version of the specimen withdrawal schedule in the UFSAR, in accordance with applicable regulations.

NRC REQUEST No. 2:

The guidance provided in GL 91-01 states that the surveillance requirements must indicate that the reactor vessel material specimens "shall be removed and examined to determine changes in material properties as required by 10CFR Part 50, Appendix H." Your proposed TS 4.4.6.1.4 omitted the above underlined phrase. Provide a revision to your proposed TS to include the underlined phrase.

GGNS RESPONSE No. 2:

GGNS TS Surveillance Requirement 4.4.6.1.4 presently reads:

The reactor vessel material specimens shall be removed and examined as a function of time and THERMAL POWER as required by 10CFR50, Appendix H...

Substitution of the phrase "... to determine changes in material properties..." is equivalent in meaning to the existing surveillance requirement. Although we believe that such a change is unnecessary and wasteful of licensee and NRC resources, we have attached a proposed surveillance requirement in accordance with your direction. Since this change is synonymous with the existing requirement, the previously submitted (GNRC-91/00047, dated March 15, 1991) No Significant Hazards Consideration analyses is unaffected by the change.